

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America
v.
Carlos Manuel Rodriguez Brime
2177 Softwind Court
Columbus, Ohio 43232

Case No.

2:21-mj-535

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 11, 2021 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 U.S.C. § 844 (e)

Offense Description
Transmitting a Bomb Threat in Interstate Commerce.

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence. *Via Facetime*

Date: August 11, 2021

City and state: Columbus, Ohio

[Signature]
Complainant's signature

SA Blane Wetzel, FBI
Printed name and title

[Signature]
Judge's signature

Elizabeth A. Preston Deavers, U.S. Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of:)	
)	
United States of America)	Case No.:
v.)	
Carlos Manuel Rodriguez Brime)	Magistrate Judge
2177 Softwind Court)	
Columbus, OH 43232)	<u>UNDER SEAL</u>

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Blane J. Wetzel, a Special Agent with the Federal Bureau of Investigation, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation and have been since August 21, 2016. I am assigned to the Public Corruption /Civil Rights Squad of the Cincinnati Division Columbus Resident Agency. In my capacity as a Special Agent, I work on the Southern Ohio Public Corruption Task Force - comprised of various state and federal agencies - and am responsible for investigating violations of federal law, including, but not limited to, public corruption, civil rights crimes, extortion, bribery, election crimes, and theft from programs receiving federal funds. I have conducted and participated in investigations that involved the use of advanced investigative techniques such as the use of: Title III interceptions; confidential human sources; consensually-monitored meetings; execution of search warrants on computers, emails, other electronic communication devices and physical structures; pen register and trap/trace devices; financial record analysis; and physical surveillance. During these investigations, which included bribery, extortion, civil rights crimes, and efforts to defraud the government, I have participated in monitoring court authorized wire interceptions, conducted consensually recorded conversations,

conducted witness interviews, analyzed telephone toll data, and analyzed documents such as legislation and financial records. Moreover, I am a federal law enforcement officer who is authorized by law to request a criminal complaint.

2. The statements contained in this affidavit are based in part on information provided by local and state law enforcement; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; and my experience, training, and background as a Special Agent. Since this affidavit is being submitted for the limited purpose of obtaining a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause that federal crimes have been committed. I have not omitted any facts that would negate probable cause. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Carlos Manuel Rodriguez Brime (BRIME) committed the violations listed below.

3. This affidavit is submitted to show that there is probable cause to believe that BRIME has violated criminal laws, including 18 U.S.C. § 844 (e) – Transmitting a Bomb Threat in Interstate Commerce.

PROBABLE CAUSE

Case Background

4. Your Choice Healthcare, LLC (YCH) is a medical facility based in the United States, specifically Columbus, Ohio, whose mission is to provide female reproductive healthcare services. YCH specifically helps individuals access safe abortions, providing oral medications to induce an abortion up until nine weeks and six days of a pregnancy term. YCH maintains a website which clearly states their mission and the services they provide, as well as location information and contact information.

5. On Sunday, April 11, 2021, YCH was closed for business and appointments. As such, all calls made to the telephone number listed on the YCH website were subsequently forwarded to an on-call staff member so that any current or future patients who were interested in YCH's services had access to YCH personnel at any time. On April 11, 2021, the on-call staff member for YCH was R.R.

6. At approximately 1:05pm, R.R. received a call on her cell phone from telephone number (614) 797-3626, a phone number she was unfamiliar with. When she answered, the caller immediately stated, *"My girlfriend is a patient there and I'm going to bring the heat. If she kills my baby, I'm going to kill her."* R.R. noted that the caller was a male who spoke very quickly and sounded angry. Before R.R. could respond, the caller immediately hung up, with the entirety of the call lasting approximately 16 seconds. R.R. was unaware of the patient referenced in the call she received or the identity of the caller but was concerned the caller intended to do harm to people connected with YCH. As such, R.R. maintained a log of the call on her phone for law enforcement.

7. At approximately 3:35pm that same day, R.R. received a second call from the same (614) 797-3626 telephone number. When she answered the call, the caller stated, *"My organization will be bringing a bomb to your facility. I suggest you close your doors."* R.R. immediately recognized the voice as being the same male caller who made the earlier threat. R.R. recalled noting that the male voice again spoke quickly, sounded angry, and hung up the call immediately after making the threat. This second call lasted approximately 12 seconds and R.R. again maintained a log of the call on her phone for law enforcement.

8. The following morning, prior to YCH opening for business, R.R. contacted the Columbus Division of Police regarding the aforementioned threats. R.R. also reported the

threats to the National Abortion Federation. The incident was initially investigated by officers from the Columbus Police Department's Counterterrorism Unit, who searched the building and surrounding areas for destructive devices then notified the Department of Homeland Security (DHS) pursuant to an internal bomb threat investigation protocol. After an initial assessment, local authorities elected to work the investigation jointly with the FBI.

Investigation into BRIME

9. Pursuant to a review of subscriber and toll records, federal investigators determined that the phone number from which the threatening calls originated from were registered to T-Mobile. Furthermore, Carlos Rodriguez, an alias used by BRIME, was listed as the registered account owner for the (614) 797-3626 telephone number. The records obtained also indicated that the telephone number has been registered to BRIME since November 3, 2020. Your affiant further confirmed that on April 11, 2021, BRIME's telephone number contacted the phone number listed on the YCH website, at the aforementioned times. The two calls BRIME made on April 11, 2021 to YCH were routed through T-Mobile switch TTTAS006, which is located in Plano, Texas.

10. In addition, further investigation revealed that at one time, an individual by the name of T.S. had paid BRIME's cell phone bill associated with his (614) 797-3626 phone number. On April 20, 2021, investigators met with T.S. and learned that she had been in a previous romantic relationship with BRIME. More specifically, T.S. indicated that she and BRIME began dating in January 2021 and had an exclusive relationship that ended on April 11, 2021, as a result of the first call that BRIME had made to YCH and his aggressive and erratic behavior afterwards.

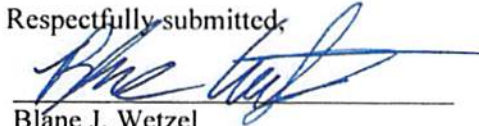
11. Through further conversation with T.S., investigators learned that on the evening of April 10, 2021, T.S. had attempted to end her relationship with BRIME and the ensuing break up conversation lasted through the following day, leading up to BRIME's first phone call to YCH on April 11, 2021. T.S. explained that in her attempt to break up with BRIME, BRIME noted that T.S. had missed her period and brought this to her attention as he kept meticulous track of her menstrual cycle. As a result of this observation, BRIME believed that T.S. was pregnant. When BRIME brought this to her attention, T.S., in light of her concerns about the ongoing relationship, decided to locate a reproductive healthcare clinic to access a pregnancy test as she did not have adequate resources to obtain one herself. T.S. used her mobile phone to begin searching for healthcare facilities and in doing so, visited the YCH website.

12. T.S. recalled that immediately after looking at YCH's website, she got up to use the restroom. BRIME then took T.S.'s phone from her hand and looked through it, noting the YCH website T.S. had just reviewed was still open in the search browser of her phone. When T.S. returned from the restroom, BRIME was angry and accused T.S. of searching for abortion clinics and "wanting to kill his baby." T.S. explained that BRIME took his own cell phone and placed a phone call [to YCH] stating *"if you let T.S. come to your clinic, I'm going to blow it up."* T.S. indicated that this call occurred around 1:00pm and that BRIME made that first phone call to YCH from T.S.'s residence located in Columbus, Ohio.

CONCLUSION

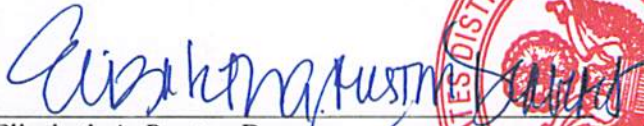
Based on the forgoing, I request that the Court issue the proposed criminal complaint and arrest warrant for the individual listed below, as there is probable cause to believe **CARLOS MANUEL RODRIGUEZ BRIME** has violated 18 U.S.C. § 844 (e) – Transmitting a Bomb Threat in Interstate Commerce.

Respectfully submitted,



Blane J. Wetzel
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on August 11, 2021



Elizabeth A. Preston Deavers
UNITED STATES MAGISTRATE JUDGE

